DWR

Comment Table, Multi-Species Conservation Strategy

Comment Number	Chapter/ Sub-Chapter	Page Number	Paragraph, Section, or Table No.	Commentor/ Agency	Comment	
	Executive Summary	ES-1	Para. 1	S. Spaar DWR	Include a definition for the Natural Community Conservation Planning Act in the Glossary	
	Executive Summary	ES-6	Para. 1	S Spaar DWR	Briefly define "R" and "r" since this is the first point it is mentioned in the document, or define these letters on p.E-3, para. 1 where the conservation goals are stated. Possible reword p E-3: The MSCS conservation goals...fall into three categories: "recovery" or "R species", "contribute to recovery" or "r species", and "maintain" or "m species".	
	5	5-3	Table 5-1	S. Spaar DWR	Table Header – SJR is missing from header for "Applicable CALFED Regions".	
	5	5-4	Table 5-1	S. Spaar DWR	Action E6 – Combine double listing of this action Add additional impact mechanism. 7 Placement of fill associated with the conversion of abandoned instream gravel pits to floodplain or channel.	
	5	5-5	Table 5-1	S. Spaar DWR	Action – Protection, enhancement, and restoration, of vernal pools. – Include Sacramento River in Applicable CALFED Regions? Also Table 5-3?	
	5	5-8	Table 5-1	S. Spaar DWR	Conveyance Facilities section should start at bottom of page There are 2 copies of Action C1. How does C1 and C2 differ?	
	5	5-3	Para. 1	S. Spaar DWR	Add sentence on p.5-11, end para.2, to end para. p.5-3 to clarify Table 5-1 – "For each summary outcome, Table 5-1 identifies how these impacts might occur; that is, the impact mechanisms."	

				Steve Yaeger DWR	In the related programs section several important programs which will affect the implementation of this plan are not mentioned - SB 1086, SJRMP, and the Comprehensive Study of the Sacramento and San Joaquin River Basins.	
				Steve Yaeger DWR	This plan needs to discuss how its proposals will affect the above mentioned programs and must identify the institutional initiatives that will be undertaken to ensure that the other resource management goals of the related programs are not compromised For example: the rock revetment for hard points and to protect the land outside the primary zone which is proposed by SB 1086 can be prohibited by the present reading of the Conservation Plan Additionally, the protection of the flood system capacity and any required upgrading of capacity which is proposed under the SJRMP and the Comp Study could be prohibited under the reading of the current plan (ie Reestablishing river meander or reforesting the river channels without appropriate integration with flood damage reduction)	
				Steve Yaeger DWR	This plan needs to discuss how measures being implemented by the above mentioned related programs and all other related programs will be melded into the Conservation Plan and must identify the institutional initiatives that will be undertaken to ensure that the resource management actions of the related	

	ES, 4	ES-4, 4-1	3	Z.Hymanson/ DWR	Last sentence of the paragraph states "The eighth, through-Delta conveyance actions, will combine new intakes, diversions and operable barriers, and operational changes, **all predicated on protection of fish populations in the Delta.**" (emphasis added) Aren't the through-Delta conveyance actions also predicated on improving/ protecting water quality and improving water supply reliability? If so, the statement should be modified to reflect all the reasons for these actions	

	ES, 5	ES-5, 5-1	2	Z.Hymanson/ DWR	It is stated "The MSCS analyzes potential CALFED Program effects on each NCCP habitat, but not for individual species The impact on individual species is inferred from the impacts to its habitat." This approach is probably okay for plants and other sessile organisms, but it is probably not appropriate for many highly mobile species such as birds and fish Implicit in this approach is the assumption that all species considered in the MSCS are habitat limited There is no evidence of habitat limitation for many of the species considered in the MSCS. In other cases, the factor(s) limiting the species may occur in a part of its range well outside the project area (e.g , migratory birds that reproduce in Canada or Alaska, anadromous fish that rear in the ocean) Finally, this approach is in conflict with many of the metrics used to determine successful conservation Many of these metrics rely on species recovery criteria that are often based on abundance and distribution. One possible solution here is to vary the basis for evaluating impacts and conservation success depending on the species considered. Potential evaluation criteria include an appropriate combination of habitat quantity and quality, species abundance and distribution. It is probably possible to group species depending on their life history and habitat use within the project area. These groups would then be evaluated using an appropriate combination of criteria.	

	ES	ES-7	Section 8, paragraph 4	Z.Hymanson/ DWR	The first sentence of this paragraph states "Progress towards goals for MSCS covered species will be measured primarily through monitoring the distribution and abundance of habitat types over time." As discussed in comment number 2, information on other metrics (e.g., species abundance and distribution, number of breeding pairs, etc.) will also be required to determine progress towards goals for the MSCS. Again, many of the recovery criteria the MSCS relies on use species abundance and distribution as metrics to determine recovery. Thus, this paragraph should also acknowledge that information on species abundance and distribution from monitoring completed as part of CMARP will also serve as measures of progress towards achieving the goals of the MSCS	
	5	5-15	Table 5-3	Z Hymanson/ DWR	This table includes columns labeled "Restored" and "Total Enhanced " The words "restored" and "enhanced" should be defined in the MSCS Glossary. There are many definitions for these words. One good source is *Restoration of Aquatic Ecosystems*. 1992. National Research Council, Science, Technology, and Public Policy. Committee on Restoration, of Aquatic Ecosystems, Science, Technology, and Public Policy. National Academic Press, Washington, D.C. 552 pp.	
	5	5-27	Table 5-6	Z.Hymanson/ DWR	The summary effect of implementing CALFED program actions with conservation measures for green sturgeon is not appropriate. We lack a basic understanding of this species population biology to know whether its long-term viability is compromised in any way. I would restate this to say "provide habitat where green sturgeon are known to occur at or greater than current levels."	

	Multi-Species Conservation Strategy	Various	Tables S and T	Andrew DWR	In the third column, change "To the consistent . ." to "To be consistent . ," this error occurs in several succeeding boxes.	
	Multi-Species Conservation Strategy	Page 5 of 7	Table S	Andrew DWR	(First column, second box) Consolidating diversions will not necessarily improve fish protection, although consolidation may provide for better or more cost-effective operations and maintenance. In fact, consolidating diversions to a location that has a relatively larger population of larvae and eggs may actually degrade fish protection.	
	Multi-Species Conservation Strategy	Page 6 of 7	Table S	Andrew DWR	(Second column, second box) An isolated conveyance facility, *if unscreened*, could result in . . .	
	Multi-Species Conservation Strategy	Page 4 of 6	Table T	Andrew DWR	(Second column, third box) Properly designed, constructed, operated, and maintained screened diversions do not entrain fish.	
	Multi-Species Conservation Strategy	Page 5 of 6	Table T	Andrew DWR	(First column, second box) Consolidating diversions will not necessarily improve fish protection, although consolidation may provide for better or more cost-effective operations and maintenance. In fact, consolidating diversions to a location that has a relatively larger population of larvae and eggs may actually degrade fish protection.	

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